

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

JAMES GHASAR et al.,

Plaintiffs,

v.

Alejandro Amaya, et al.,

Defendants.

Civil Action No. 1:18-cv-1296 (CMH/IDD)

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS’  
MOTION FOR ISSUANCE OF SCHEDULING ORDER**

Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Rule 16(B) of the Local Rules for the United States District Court for the Eastern District of Virginia, Plaintiffs respectfully request that this Court issue a scheduling order in this matter. Plaintiffs served their Amended Complaint on Defendants Lucas Vinyard and Alejandro Amaya on March 29, 2019.<sup>1</sup> Defendants Lucas Vinyard and Alejandro Amaya filed their Answer on June 26, 2019 and June 27, 2019, respectively.

Plaintiffs, by counsel, contacted counsel for the Defendants on February 19, 2020 to either schedule a conference of the parties as required by Federal Rule of Civil Procedure 26(f) or determine Defendants’ position on this motion in accordance with Local Civil Rule 7(E). Counsel for the Defendants responded that Defendants object to Plaintiffs’ request. Considering

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<sup>1</sup> Plaintiffs also have a related action against the United States under the Federal Tort Claims Act pending in this District (Civil Action No. 1:19-cv-01224). The Court issued a scheduling order in that action on January 24, 2020.

the delay that has already occurred to date and in the interest of timely commencing discovery, Plaintiffs respectfully request that this Court issue a scheduling order pursuant to Federal Rule of Civil Procedure 16(b).

Dated: February 24, 2020

Respectfully submitted,

/s/ Thomas G. Connolly  
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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2020, I caused a true and correct copy of the foregoing to be filed and served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

/s/ Thomas G. Connolly  
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